

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al., ¹ <div style="text-align: center; padding-top: 20px;">Debtors.</div>	x : : : : : : : : v	Chapter 11 Case No. 24-12534 (JKS) (Jointly Administered)
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**NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR HEARING ON
APRIL 1, 2025 AT 1:00 P.M. (ET)²**

This proceeding will be conducted **in-person**.
All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.
Please refer to Judge Stickles' Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the
hearing unless otherwise noticed using the [eCourtAppearances](#) tool available on the Court's
website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

I. CONTESTED MATTERS

1. Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024; D.I. [10](#)].

Related Documents:

- A. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [87](#)].
- B. Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [119](#)].
- C. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- D. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)].
- E. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [275](#)].
- F. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)].
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/08/2025; D.I. [416](#)].
- H. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 02/14/2025; D.I. [702](#)].
- I. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 03/14/2025; D.I. [988](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- J. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].
- K. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- L. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].
- M. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)].
- N. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)].

Status: This matter is going forward for the limited purpose of entry of an interim order authorizing further interim financing. A proposed form of order will be filed prior to the hearing. This matter will go forward.

- 2. Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Related Documents:

- A. Amendment to Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne

Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 11/06/2024, D.I. [68](#)].

- B. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024, D.I. [87](#)]. (See [1A](#).)
- C. Interim Order (A) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [128](#)].
- D. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See [1C](#))
- E. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)]. (See [1D](#))
- F. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)]. (See [1F](#))
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/08/2025; D.I. [416](#)]. (See [1G](#))
- H. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 02/14/2025; D.I. [702](#)]. (See [1H](#))
- I. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 03/14/2025; D.I. [988](#)]. (See [1I](#))

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Responses:

- J. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See [1J](#))
- K. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].

- L. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)]. (See [1K](#))
- M. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)]. (See [1I](#))
- N. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)]. (See [1M](#))
- O. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)]. (See [1N](#))

Status: This matter is going forward for the limited purpose of entry of an interim order authorizing further interim financing. A proposed form of order will be filed prior to the hearing. This matter will go forward.

Dated: March 28, 2025

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)
1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 754-4603

Email: lmc michael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Counsel for the Debtors